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April 15, 2021

BY ECF

Hon. Joan M. Azrack
United States District Judge
Eastern District of New York
100 Federal Plaza, Courtroom 1030
Central Islip, New York 11722

Re: United States v. Vincent Trimarco, Jr., 17 CR 583 (JMA)

Dear Judge Azrack:

I am writing to respectfully request a 30-day adjournment of defendant Vincent Trimarco's May 12, 2021 sentencing and related briefing schedule. To briefly explain, I am in the process of gathering financial records for Mr. Trimarco's sentencing, which has been made difficult due to his accountant being otherwise busy with tax season, coupled with the ongoing pandemic. This material will be relevant to both our sentencing submission and my oral presentation – the financial records that I have requested date back to 2017, the period covering the charged conduct. The government, by AUSA Catherine Mirabile, has no objection to this request.

Thank you for the Court's consideration on this matter. I remain available for a telephone conference on this application should Your Honor deem it necessary.

Respectfully submitted,


Jeffrey Lichtman

cc: Catherine Mirabile, Esq.
Michael Bushwack, Esq.
Assistant United States Attorneys (by ECF)